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5 Attorney for RAQUEL MANZO PORTILLO

6  
7 **UNITED STATES DISTRICT COURT**  
8 **FOR THE NORTHERN DISTRICT OF CALIFORNIA**  
9 **OAKLAND DIVISION**

10 THE UNITED STATES OF AMERICA, ) **No. CR-17-00554 PJH**  
11 )  
Plaintiff, ) STIPULATION AND  
12 vs. ) ~~PROPOSED~~ ORDER FOR  
13 ) PERMISSION TO TRAVEL  
RAQUEL MANZO PORTILLO ) OUT OF NORTHERN DISTRICT  
14 Defendant. ) APRIL 6, 2018  
)

15 The Defendant RAQUEL MANZO PORTILLO, through her counsel, DEBORAH G.  
16 LEVINE and Assistant United States Attorney, HELEN GILBERT, do hereby stipulate that  
17 Defendant, RAQUEL MANZO PORTILLO, be permitted to travel out of the Northern District on  
18 APRIL 6, 2018 and return on the same day to attend the burial of her sister, Guadalupe Manzo-  
19 Ochoa in Merced County at the Plainsburg Cemetery.

20 The defendant is currently in compliance with the conditions of her pre-trial release. United  
21 States Pre-Trial Service Officer Kalisi Kupu was informed of these travel plans and he has no  
22 objection as long as Ms. Manzo Portillo provides details of her travel plans and continues to remain  
23 in contact by telephone with pre trial services as required. All other release conditions to remain  
24 unchanged.

25 For the forgoing reasons, the parties stipulate and agree that Raquel Manzo Portillo be  
26 permitted to travel out of the Northern District of California to Merced County (by car) April 6, 2018  
27 and return to the Northern District on the same day.  
28 .

1 IT IS SO STIPULATED:

2 Dated: April 4, 2018

/s/ Helen Gilbert

HELEN GILBERT

Assistant United States Attorney

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4  
5 Dated: April 4, 2018

/s/ Deborah G. Levine

DEBORAH G. LEVINE

Attorney for Raquel Manzo Portillo

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7  
8 **~~PROPOSED~~ ORDER**

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11 UPON STIPULATION OF THE PARTIES AND FOR GOOD CAUSE SHOWN, THE COURT  
12 HEREBY AUTHORIZES RAQUEL MANZO PORTILLO TO TRAVEL OUT OF THE NORTHERN  
13 DISTRICT OF CALIFORNIA ON APRIL 6, 2018 TO ATTEND HER SISTER'S BURIAL IN  
14 MERCED COUNTY AND RETURN THAT SAME DAY TO THE NORTHERN DISTRICT. ALL  
15 TRAVEL DETAILS SHALL BE PROVIDED TO PRE TRIAL SERVICES BEFORE LEAVING  
16 THE NORTHERN DISTRICT. ALL OTHER RELEASE CONDITIONS REMAIN UNCHANGED.  
17

18  
19 IT IS SO ORDERED

20 Dated: 4/5/18



KANDIS A. WESTMORE

UNITED STATES MAGISTRATE JUDGE